

REMARKS

Claims 6, 8-10, 25, 28, 29, 32-44 are pending in the application as claims 16, 18-20, 26, 27, 30, and 31 (which were rejected in the 11/27/09 Non-Final OA) are cancelled herein and claims 32-44 are added herein. Claims 6, 8-10, 25, and 28-29 were rejected and are amended herein. It is to be appreciated that while reference may be made back to certain parts of the application in this Reply (e.g., page numbers, line numbers, Figs., etc.), that such referencing is not to be interpreted in a limiting manner (e.g., to limit the scope of the claims and/or features therein to the particular portion(s) referenced), but is instead merely done for purposes of explanation, illustration and/or ease of understanding. Reconsideration of the application in light of the following remarks is respectfully requested.

I. REJECTION OF CLAIMS 30-31 UNDER 35 U.S.C. §112, FIRST PARAGRAPH

Claims 30 and 31 are rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement. Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claims 30 and 31 are cancelled herein. It will be appreciated that while claims 30 and 31 are cancelled herein to expedite prosecution, it is respectfully submitted that claims 30 and 31 do not fail to comply with the written description requirement. The Non-Final Office Action asserts that the terms “non-phonetic text string,” which are provided in independent claim 30, are not adequately supported in the specification of the instant application. Referring to Fig. 10 and accompanying text, it is respectfully submitted that such language is adequately supported.

Withdrawal of this rejection is therefore respectfully requested.

II. REJECTION OF CLAIMS 6, 8-10, 16, 18-20, AND 25-29 UNDER 35 U.S.C. §103(a)

Claims 6, 8-10, 16, 18-20, and 25-29 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Janakiraman et al., U.S. Patent No.: 7,369,986 (*hereinafter* “Janakiraman”), in view of Bruso et al., U.S. Patent No.: 5,649,214 (*hereinafter* “Bruso”). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claims 16, 18-20, 26 and 27 are cancelled herein.

Independent claim 6 provides for, among other things, receiving a text string in a first alphabet **on an input of a computing device**. It is respectfully submitted that Janakiraman and Bruso, alone or in combination, do not teach this feature. For example, Janakiraman teach that a user selects and clicks on a text string displayed on a computer screen with a mouse device operably coupled to a computer (see Non-Final OA, pg. 3). Thus, what is received on the input (e.g., the mouse) is merely a “click,” or other signal, that activates a transliteration mechanism to transliterate the selected text. Janakiraman does not provide that the **text string is received on the input** (e.g., the mouse or a keyboard), as provided for independent claim 6. For example, a text string would be received on an input (e.g., a keyboard) if a user was typing the text string on the input. It is respectfully submitted that typing a text string on an input (causing the text string to be received on the input), for example, is different than selecting and clicking on a text string (wherein what is received on the input is a selection, not the text string itself).

Independent claim 6, as amended, also states that receiving the text string **does not comprise receiving a selection of previously entered text**. It is respectfully submitted that Janakiraman and Bruso, alone or in combination, do not teach this feature. For example, Janakiraman merely teach transliterating a previously entered phrase or word that is displayed to the user as part of a webpage. Stated differently, the text string that is received (for transliteration) is merely selected from (a list of) previously entered text (strings) (e.g., via a webpage that is displayed to a user).

By way of example, Fig. 6 of Janakiraman illustrates that the text string that is transliterated is merely selected from previously entered text and is not received on an input of the computing device. Rather, the transliteration module 610 receives a document 602 and one or more input messages 604, 606, 608. The document 602 (e.g., an html page) “preferably **includes text in one or more Indian languages**” (see, e.g., Fig. 4C). A user of the computing device “may click and drag over a phrase [from the document 602] and double-click to activate the transliteration mechanism” (col. 7, lines 7-9, 18-20). Thus, the text string (e.g., Indian phrase) that is transliterated is preexisting in the document 602 and is not received on an input of a computing device as provided in claim 6. Rather, what is received on an input of a computing device is merely a “selection” input that simply **activates** the transliteration module 610 (see col. 7, lines 10-24).

By way of further example, Fig. 4C of Janakiraman illustrates that the text (e.g., Indian phrase) that is being translated, or transliterated, is text from a previously created html page, for example, that is loaded onto a browser window. Thus, while a user can select a word or phrase to be transliterated, **the selected text is “previously entered text” and is not “received . . . on an input of the computing device”** (e.g., on a keyboard) as provided in independent claim 6. That is, a user does not “textually” enter the phrase to be translated (e.g., by typing on a keyboard). Rather a user can merely “hover over”, “click on” and/or otherwise select a preexisting phrase for translation.

It is thus respectfully submitted that independent claim 6 is not anticipated by Janakiraman, and Bruso fail to make up for the deficiencies of Janakiraman with regard to claim 6. Independent claim 6 and the remaining rejected claims depending therefrom are thus believed to be allowable over the recited references, and withdrawal of the rejection is respectfully requested.

III. REJECTION OF CLAIMS 30 AND 31 UNDER 35 U.S.C. §103(a)

Claims 30 and 31 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Janakiraman in view of Tolin et al., U.S. Patent No.: 5,490,061 (*hereinafter* "Tolin"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claims 30 and 31 are cancelled herein.

Withdrawal of this rejection is therefore respectfully requested.

IV. NEW CLAIMS 32-44

Claims 32-44 are added herein, and are believed to be allowable over the cited references for at least the following reasons.

Claims 32-35 depend from independent claim 6 which is believed to be allowable for at least the following reasons.

Independent claims 36 and 43 provide, among other things, receiving a text string in a first alphabet **on an input** of a computing device, and independent 43 provides that receiving the text string **does not comprise receiving a selection of previously entered text**. For at least the reasons discussed with respect to independent claim 6, it is believed that Janakiraman, Brusco, and Tolin, alone or in combination, do not teach this element.

Further, independent claim 36 provides for, among other things, creating a phonetic mapping scheme between a first alphabet and a second alphabet **if it is determined that a first predefined mapping scheme does not exist** between the first alphabet and the second alphabet and using the created phonetic mapping scheme to convert a text string in the first alphabet to a phonetic string in a second alphabet. In this way, a text string in a first alphabet can be converted to a phonetic string in a second alphabet even where there is no predefined mapping scheme between the first alphabet and the second alphabet, for example (*see e.g.*, para. 46 of the instant application). Stated differently, a roadmap can be created detailing how text in the first alphabet can be converted to a phonetic string in the second alphabet even if there is

no predefined mapping scheme from the first alphabet to the second alphabet, for example. It is respectfully submitted that the cited references do not teach these elements. For example, Tolin teach converting text in a first alphabet to text in a second alphabet using a bridge (e.g., an international, artificial language). Thus, there is always a predefined mapping scheme (e.g., first language to bridge language to second language), and there is no determination of whether or not a predefined mapping scheme exists between the first and second alphabets. Independent claim 36 and claims depending therefrom are thus believed to be allowable over Tolin and the remaining cited references.

For at least the foregoing reasons, independent claims 36 and 43 and the claims depending therefrom are believed to be allowable over the cited references. Allowance of the same is therefore respectfully requested.

V. CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be in condition for allowance.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application; the Examiner is invited to contact the undersigned at the telephone number provided below.

Should and fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 50-5088, **306213.01**.

Respectfully submitted,
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